

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Shai Y. Waisman

REILLY POZNER LLP  
1900 16th Street, Suite 1700  
Denver, Colorado 80202  
Telephone: (303) 893-6100  
Facsimile: (303) 893-6110  
Michael A. Rollin

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----  
**In re** : **Chapter 11 Case No.**  
**LEHMAN BROTHERS HOLDINGS INC., et al.** : **08-13555 (JMP)**  
**Debtors.** : **(Jointly Administered)**  
-----

**DECLARATION OF KERI REED  
IN SUPPORT OF DEBTORS' ONE HUNDRED NINTH  
OMNIBUS OBJECTIONS TO CLAIMS (INSUFFICIENT DOCUMENTATION)**

Pursuant to 28 U.S.C. §1746, I, Keri Reed, declare:

1. I am over 18 years of age and have personal knowledge of all of the facts set forth in this declaration and if called upon to testify as a witness, I could testify to the truth of the matters set forth herein.

2. I submit this Declaration in support of *Debtors' One Hundred Ninth Omnibus Objection to Claims (Insufficient Documentation)* ("Objection") [Docket No. 15008].

3. I am an Assistant Vice President of LAMCO LLC. LAMCO LLC is a non-

debtor subsidiary of Lehman Brothers Holdings, Inc. (“LBHI”) that has been charged with managing LBHI’s assets. I have held this position since September 2010.

4. As a part of my duties as Assistant Vice President, I have contacted each of the claimants (the “Claimants”) whose proofs of claim are identified in Exhibit A to the Objection, and have requested data supporting their claims in order to permit the Debtors to evaluate the validity of such claims. I requested both qualitative and quantitative data including but not limited to: the seller loan number; the buyer loan number; the servicer loan number and servicer name; the type of claim (i.e., misrepresentation of value); the address of the real property securing the mortgage loan; unpaid principal balance on the loan; and the status of the loan. Notwithstanding such requests, Claimants have not provided the Debtors with sufficient data or information. The little information and data Claimants have provided does not support the validity of their claims.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: March 14, 2011.

/s/ Keri Reed

Keri Reed